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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

NOV 17 2000

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of)	
)	
2000 Biennial Regulatory Review)	IB Docket No. 00-202
)	
Policy and Rules Concerning the International)	
Interexchange Marketplace)	

COMMENTS OF EXCEL COMMUNICATIONS, INC.

Excel Communications, Inc. ("Excel"), by its attorneys, hereby respectfully files comments in response to the Federal Communications Commission's ("Commission's") October 18, 2000 Notice of Proposed Rule Making that proposes, *inter alia*, to impose mandatory detariffing requirements on providers of international interexchange telecommunications services in much the same manner as the Commission has imposed such a detariffing mandate upon providers of domestic interstate services.

Excel generally supports the Commission's tentative conclusions. Most important, we urge the Commission to issue a final order as quickly as possible so that Excel and other carriers have the option of engaging in domestic and international detariffing simultaneously. Simultaneous detariffing will promote reliable and consistent customer notification, minimize customer confusion, and promote lower customer rates by reducing carriers' compliance costs. As a result, Excel urges the Commission to issue a final decision that permits Excel to engage in simultaneous detariffing on January 31, 2001 for its contract-type services and on April 30, 2001 for its mass market consumer services. At the same time, in recognition of the compliance costs and the burdens that carriers have already shouldered to implement domestic detariffing, Excel

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submits that carriers should have the option of engaging in international detariffing after they have completed domestic detariffing. To that end, Excel submits that the Commission should establish a nine-month transition plan for mandatory international detariffing from the effective date of the Commission's order.

Excel is one of the largest U.S. long distance carriers in terms of presubscribed lines. Excel currently provides U.S. domestic and international long distance services to approximately three million subscribers, and roughly 80% of those subscribers are residential. Excel provides international and domestic services to subscribers in every state, and its customers are spread among urban, suburban and sparsely-populated areas. The demographics of Excel's customer base only underscores the benefits to consumers, to say nothing of carriers, from a prompt order that will permit simultaneous detariffing.

From its perspective, one of the most important things Excel must do as the industry migrates from tariffs to contracts is to properly inform our customers of this change and how it will affect them. Pursuant to the rules established for domestic services and those now proposed for international services, Excel will take steps to make sure that its subscribers understand the rates, terms and conditions pertaining to their service. Unfortunately, because the detariffing of international and domestic services has developed in separate proceedings and under the oversight of different Bureaus, the detariffing requirements, though essentially the same, conceivably could have different deadlines associated with them. This poses two potential problems: implementation costs and customer confusion.

In order to provide adequate notice of detariffing, and to ensure a continuity of the contractual relationship between Excel and its subscribers, Excel will directly notify and provide

informational materials to every existing customer by January 31, 2001 (for contract-type customers) and by April 30, 2001 (for mass market customers). The cost of preparing for and implementing this plan will total many millions of dollars. If, as a result of this proceeding, additional deadlines are established for compliance with regulations requiring the detariffing of international services, duplicate implementation efforts and notification mailings will be required for Excel's extensive customer base. These significant and unnecessary costs not only will burden carriers, they will harm consumers because they will force carriers to raise some or all retail rates to recover them.

Fortunately, this can be avoided in some cases if the Commission quickly issues a decision so that carriers have the option of engaging in simultaneous detariffing for domestic and international services. In other cases, however, where a carrier has already reached its short-term limit on the resources that it can spend on detariffing efforts, it may be necessary for a carrier to take time to again allocate those resources needed for the implementation and notification efforts associated with detariffing international services. As such, the Commission should also establish a nine-month transition period for international detariffing for carriers that may be unduly burdened by the simultaneous detariffing of domestic and international services.

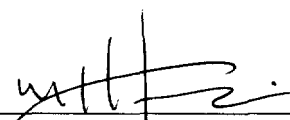
More problematic than the implementation costs is the customer confusion that easily could result from detariffing domestic and international services at different times. Confusion is a particular concern for residential customers, who are less familiar than business customers with the regulatory context surrounding the provisioning of telecommunications services. It is Excel's opinion that a dual regime for international and domestic detariffing is inconsistent with the expectations of our customers, who increasingly—and correctly—perceive domestic and

international long distance as different aspects of a single product offering. Simultaneous detariffing will allow Excel to explain in a single notification how the customer's "long distance service" relationship with Excel will be affected by detariffing. Further, simultaneous detariffing of international and domestic services will minimize customer confusion because all of a carrier's interstate and international interexchange offerings may be posted on the Internet at the same time.

For the foregoing reasons, Excel submits that the Commission should move quickly to produce an order that allows for the alignment of the detariffing transition periods for domestic and international services for those carriers prepared to do so, and also provides a nine-month transition period for detariffing international services for those carriers whose resources may not permit simultaneous detariffing.

Respectfully submitted,

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Dated: November 17, 2000

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 17th day of November 2000, a true copy of the foregoing Comments of Excel Communications, Inc. was hand-carried to the following:

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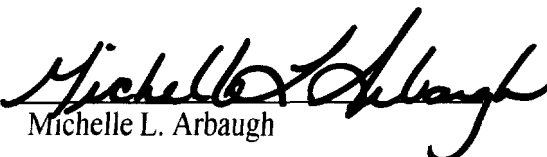
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